

# Exhibit C

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-cv-21929-BLOOM/Elfenbein**

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

---

**DECLARATION OF JEFFREY GUTCHESS, ESQ.**

1. I am an attorney at law licensed to practice in the State of Florida. I am a member of the bar of this Court and I am the founding partner at AXS Law Group, PLLC (“AXS”) and counsel of record for Motorsport Games Inc. (“MSGM”). I make this declaration in support of MSGM’s *Verified* Motion for an Award of Reasonable Attorneys’ Fees and Costs and Incorporated Memorandum of Law (“*Verified* Motion”). I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently under oath.

2. I am counsel for Defendant in this matter.

3. I hold a juris doctorate degree from Cornell Law School, where I received the American Jurisprudence award as the best student in advocacy.

4. I am admitted to practice in Florida (2004), in New York (1996), and Pennsylvania (1992).

5. I worked well over 20 years at prestigious law firms until I founded AXS Law Group, who won the Daily Business Review’s “Commercial Litigation Department of the Year”

in South Florida twice in three years, and was selected as a Spotlight Firm by Chambers & Partners. Before that, I won the New York Legal Aid Society award for best pro bono brief, which secured the release from prison of an individual who had been wrongfully convicted of manslaughter. I also won the “Most Effective Lawyer” award for the defense of an international beverage company in nationwide class actions.

6. The time records attached to MSGM’s Verified Motion are true and accurate and represent a reasonable amount of hours billed since November 25, 2024 in this matter.

7. Since November 25, 2024, I have billed .8 hours in this case, as reflected in the task descriptions I personally drafted and entered in my billing records. The time spent was reasonable and necessary to defend MSGM in this case.

8. My current typical rate in commercial litigation cases is \$850.00 per hour.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed on June 6, 2025 in Miami, Florida

/s/ Jeffrey Gutchess  
Jeffrey Gutchess, Esq.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-cv-21929-BLOOM/Elfenbein**

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

---

**DECLARATION OF JOSHUA SHORE, ESQ.**

1. I am an attorney at law licensed to practice in the State of Florida. I am a member of the bar of this Court and I am partner at the law firm of AXS Law Group, PLLC (“AXS”) and counsel of record for Motorsport Games Inc. (“MSGM”). I make this declaration in support of MSGM’s *Verified* Motion for an Award of Reasonable Attorneys’ Fees and Costs and Incorporated Memorandum of Law (“*Verified* Motion”). I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently under oath.

2. I am counsel for Defendant in this matter.

3. I hold a juris doctorate degree from University of Miami School of Law, where I graduated *magna cum laude* as a member of the Order of the Coif after serving as an editor for the University of Miami Inter-American Law Review.

4. I was admitted to practice in Florida since 2006 and I am also admitted to the United States Supreme Court.

5. Following graduation, I served as a law clerk to two federal judges—United States Magistrate Judge Andrea M. Simonton and United States District Judge Jose E. Martinez—and have now been a practicing attorney in Florida for approximately 20 years, handling a wide variety of complex civil and criminal litigation matters, including high-stakes employment, commercial, and contractual disputes.

6. Before joining AXS Law Group, I was a partner at another boutique litigation firm where I was part of the three-person team named the Most Effective Lawyers in the Appellate Category by the Daily Business Review.

7. At AXS Law Group, where I have been a partner for the past six years, our team has also received numerous accolades as a result of having prevailed in several major trials, including being recognized as the Daily Business Review’s “Commercial Litigation Department of the Year” in South Florida twice in three years, and being selected as a Spotlight Firm by Chambers & Partners.

8. I have been recognized as a “Rising Star” by Florida Super Lawyer, a “Legal Elite” by Florida Trend Magazine, and a “Top Up and Comer” by South Florida Legal Guide.

9. The time records attached to MSGM’s Verified Motion are true and accurate and represent a reasonable amount of hours billed since November 25, 2024 in this matter.

10. Since November 25, 2024, I have billed 8.2 hours in this case, as reflected in the task descriptions I personally drafted and entered in my billing records. The time spent was reasonable and necessary to defend MSGM in this case.

11. My current typical rate in commercial litigation cases is \$725.00 per hour.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed on June 6, 2025 in Miami, Florida

/s/ Joshua Shore  
Joshua Shore, Esq.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-cv-21929-BLOOM/Elfenbein**

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

---

**DECLARATION OF ALICE FEROT, ESQ.**

1. I am an attorney at law licensed to practice in the State of Florida. I am a member of the bar of this Court and I am of counsel at the law firm of AXS Law Group, PLLC (“AXS”) and counsel of record for Motorsport Games Inc. (“MSGM”). I make this declaration in support of MSGM’s *Verified* Motion for an Award of Reasonable Attorneys’ Fees and Costs and Incorporated Memorandum of Law (“*Verified* Motion”). I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently under oath.

2. I am lead counsel for MSGM in this matter.

3. I hold a juris doctorate degree from Florida International University College of Law, where I was on the Dean’s List every eligible semester and an associate Member of the FIU Law Review. I graduated from New York University School of Law with a L.L.M. in General Studies. I hold the equivalent of a juris doctorate degree from the University of Paris XII, France, where I graduated with honors. I also graduated as Salutatorian of the class from the University of Montpellier, School of Law, where I obtained the equivalent of a L.L.M. in International Law.

4. I was admitted to the Florida Bar in 2012 and to the New York Bar in 2009.

5. I have been practicing in Florida for over ten years. I have acted as lead counsel in numerous complex civil litigation matters, including high-stake employment, commercial, and contractual disputes. I have experience in federal courts and clerked twice for the late United State District Judge Marcia Cooke. Prior to that, I worked as corporate counsel for a French defense contractor, where I reported to the General Counsel and CEO and was personally responsible for the negotiation of multi-million dollar contracts.

6. I have been working for AXS Law Group for six years. Our team of attorneys was recognized as “Commercial Litigation Department of the Year” in South Florida, winning the award for the second time in three years, was selected as a chambers spotlight firm, and won three major jury trials in the recent years.

7. The time records attached to MSGM’s Verified Motion are true and accurate and represent a reasonable amount of hours billed since November 25, 2024 in the above-captioned matter.

8. Since November 25, 2024, I have billed 180.5 hours in the above mentioned case. I personally entered this time and drafted the task descriptions. The time spent was reasonable and necessary to defend MSGM in the above-mentioned case.

9. My current typical rate in a commercial litigation cases is \$550.00 per hour.

10. As lead counsel in this case, I oversaw the paralegals, who have worked on this case under my direction. The paralegals are:

- Lina Cohen, who has over 17 years of experience as a paralegal;
- Eva Areias, who has 10 years of experience as a paralegal,
- Adam Olivero, who has 5 years of experience as a paralegal; and



- Alejandra Pacheco, who has 3 years of experience as a paralegal.

11. Since November 25, 2024, they have billed the following number of hours in the above mentioned case:

- . Lina Cohen: 13.5 hour;
- Eva Areias: 5.5 hours,
- Adam Olivero: 2 hours; and
- Alejandra Pacheco: 19.67 hours.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed on June 6, 2025 in Miami, Florida

/s/ Alice Ferot  
Alice Ferot, Esq.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-cv-21929-BLOOM/Elfenbein**

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

---

**DECLARATION OF JENNA FEROLIE, ESQ.**

1. I am an attorney at law licensed to practice in the State of Florida. I am a member of the bar of this Court and I am an associate at the law firm of AXS Law Group, PLLC (“AXS”) and counsel for Motorsport Games Inc. (“MSGM”). I make this declaration in support of MSGM’s *Verified* Motion for an Award of Reasonable Attorneys’ Fees and Costs and Incorporated Memorandum of Law (“*Verified* Motion”). I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently under oath.

2. I am counsel for Defendant in this matter.

3. I hold a juris doctorate degree from University of Miami School of Law.

4. I was admitted to the Florida Bar in 2024.

5. As a junior attorney, I have been a practicing in Florida for less than one year. In my brief time of practice, I have acted as junior counsel in numerous complex civil litigation matters, including both commercial and contractual disputes. I have some experience in federal courts, based on my employment at AXS and previous internships.

6. I have been working for AXS Law Group for approximately a year and a half, first as an intern and then as an attorney once admitted to the bar. Our team of attorneys was recognized as “Commercial Litigation Department of the Year” in South Florida, winning the award for the second time in three years, was selected as a chambers spotlight firm, and won three major jury trials in the recent years.

7. The time records attached to MSGM’s Verified Motion are true and accurate and represent a reasonable amount of hours billed since September 30, 2025 in the above-captioned matter.

8. Since November 25, 2025, I have billed 16.7 hours in the above-mentioned case. I personally entered this time and drafted the task descriptions. The time spent was reasonable and necessary to defend MSGM in the above-mentioned case.

9. My current typical rate in a commercial litigation cases is \$350.00 per hour.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed on June 6, 2025 in Miami, Florida

/s/ Jenna Ferolie  
Jenna Ferolie, Esq.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 24-cv-21929-BLOOM/Elfenbein**

ZACHARY GRIFFIN,

Plaintiff,

v.

MOTORSPORT GAMES INC.,

Defendant.

---

**DECLARATION OF JOHN SPENCER (“JACK”) FLAGG, ESQ.**

1. I am an attorney at law licensed to practice in the State of Florida. I am a member of the bar of this Court and I am of counsel at the law firm of AXS Law Group, PLLC (“AXS”) and counsel of record for Motorsport Games Inc. (“MSGM”). I make this declaration in support of MSGM’s *Verified* Motion for an Award of Reasonable Attorneys’ Fees and Costs and Incorporated Memorandum of Law (“*Verified* Motion”). I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently under oath.

2. I am associate counsel for Defendant in this matter.

3. I hold a juris doctorate degree from University of Miami School of Law.

4. I was admitted to the Florida Bar in 2024.

5. I have been a practicing in Florida for over one year. I have experience litigating in both state and federal courts.

6. I have been working for AXS Law Group for six months. Our team of attorneys was recognized as “Commercial Litigation Department of the Year” in South Florida, winning the award for the second time in three years, was selected as a chambers spotlight firm, and won

three major jury trials in the recent years. Before working at AXS Law Group, I worked for Henderson, Franklin, Starnes & Holt, P.A. – one Southwest Florida’s oldest law firms that recently celebrated its 100-year anniversary.

7. The time records attached to MSGM’s Verified Motion are true and accurate and represent a reasonable amount of hours billed since November 25, 2024 in the above-captioned matter.

8. Since November 25, 2024, I have billed 20.6 hours in the above-mentioned case. I personally entered this time and drafted the task descriptions. The time spent was reasonable and necessary to defend MSGM in the above-mentioned case.

9. My current typical rate in a commercial litigation case is \$350.00 per hour.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct. Executed on June 6, 2025 in Miami, Florida.

/s/ John Spencer Flagg  
John Spencer Flagg, Esq.